

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

MONTEZ BROWN (1)

a.k.a. Tez Blood

DANTRELL JOHNSON (2)

a.k.a. Trell Moe

GREGORY HAMILTON (3)

a.k.a. Lil' Lord

KEON PRUITT (4)

a.k.a. KenKen

JOVAN KNIGHT (5)

a.k.a. JoJo

a.k.a. 23

TYREESE GILES (6)

a.k.a. Reese

JOSIAH TAYLOR (7)

a.k.a. Joker

DOUGLAS MOBLEY (8)

a.k.a. Nut

JARRETT ROBINSON (9)

a.k.a. Gator

TREVAUN ROBINSON (10)

a.k.a. Tricky Tre

ISAAC HODGE (11)

a.k.a. Ike

CHRISTOPHER FINCH (12)

a.k.a. Twin

TONY JELKS (13)

a.k.a. BD

CORTEZ BLAKEMORE (14)

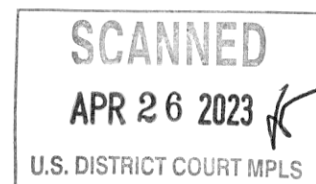
a.k.a. Tez

RANDY TATE (15)

a.k.a. Randy

NO. CR 23-160 WMW/TNL

TO BE FILED UNDER SEAL



TREVONEIA FELTON (16)
a.k.a. Tre
CHASE ROBERTSON (17)
a.k.a. Chase Loco
MALCOLM SAMUELS (18)
a.k.a. Reggie
WILLIAM BANKS (19)
a.k.a. Bear
a.k.a. Big Will
RONALD WASHINGTON (20)
a.k.a. Black
WILLIAM JOHNSON (21)
a.k.a. Lil' Will
DASHAUN MORRIS (22)
a.k.a. Mush
ERNEST BOYD (23)
a.k.a. Shaky Shawn
MARON BAILEY (24)
a.k.a. Boonie
ISAIAH BELL (25)

INDICTMENT

The Grand Jury charges:

COUNT ONE

**Racketeer Influenced and Corrupt Organizations (RICO) Conspiracy
(Violation of 18 U.S.C. § 1962(d))**

The Enterprise

1. At all times relevant to this Indictment, the defendants, **Montez Brown, a.k.a. Tez Blood (“Brown”); Dantrell Johnson, a.k.a. Trell Moe (“D.Johnson”); Gregory Hamilton, a.k.a. Lil’ Lord (“Hamilton”); Keon Pruitt, a.k.a. KenKen**

(**“Pruitt”**); **Jovan Knight, a.k.a. JoJo, a.k.a. 23 (“Knight”)**; **Tyreese Giles, a.k.a. Reese (“Giles”)**; **Josiah Taylor, a.k.a. Joker (“Taylor”)**; **Douglas Mobley, a.k.a. Nut (“Mobley”)**; **Jarrett Robinson, a.k.a. Gator (“J.Robinson”)**; **Trevaun Robinson, a.k.a. Tricky Tre (“T.Robinson”)**; **Isaac Hodge, a.k.a. Ike (“Hodge”)**; **Christopher Finch, a.k.a. Twin (“Finch”)**; **Tony Jelks, a.k.a. BD (“Jelks”)**; **Cortez Blakemore, a.k.a. Tez (“Blakemore”)**; **Randy Tate, a.k.a. Randy (“Tate”)**; **Trevoneia Felton, a.k.a. Tre (“Felton”)**; **Chase Robertson, a.k.a. Chase Loco (“Robertson”)**; **Malcolm Samuels, a.k.a. Reggie (“Samuels”)**; **William Banks, a.k.a. Bear, a.k.a. Big Will (“Banks”)**; and **Ronald Washington, a.k.a. Black (“Washington”)**, and others known and unknown to the Grand Jury, were each members and associates of a criminal organization, namely, the **“Highs,”** (hereinafter, **“The Enterprise”** or **“the Highs”**), which was engaged in, among other things, acts of violence to include murder, assault, robbery as well as drug distribution and firearms trafficking. At all times relevant to this Indictment, the Highs operated in the District of Minnesota, and elsewhere.

2. The Highs, including its leadership, membership, and associates, constituted an “enterprise,” as defined by 18 U.S.C. § 1961(4), that is, a group of individuals associated in fact. The Highs constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. The Highs were engaged in, and its activities affected, interstate and foreign commerce.

Structure of the Enterprise

3. The structure and operation of the Highs included, but were not limited to, the following:

- a. The Highs have been in existence in Minneapolis since approximately 2008, and were primarily active in the northside of Minneapolis.
- b. Prospective Highs members proved their loyalty to the gang by “putting in work”; that is, by committing acts of violence for the benefit of the gang or offering another benefit to the gang such as, for example, introducing a source for drugs or firearms. Highs members may be expelled from the gang for failing to “put in work.” Highs members who are expelled from the gang may get physically assaulted as part of the exit process.
- c. The Highs had leaders or “shot callers.” The shot callers determined the quantity of illegal drugs that other members would receive to sell or re-sell and the locations where particular Highs members were permitted to sell drugs. The shot callers sometimes took the lead in obtaining and distributing firearms to Highs members.
- d. Highs members used common phrases on social media to publicly identify themselves with the Enterprise. Highs members commonly posted “030” on social media, referring to the intersection 30th Avenue North and Colfax Avenue North, and “2300,” referring to a Highs’ hangout near 23rd Avenue North and 4th Street North.
- e. Highs members often disrespected and mocked deceased rival gang members in social media posts. Conversely, Highs members commonly paid tribute to deceased or incarcerated Highs members publicly on social media and by

wearing clothing and sporting tattoos that pay tribute to deceased Highs members.

- f. Highs members used common hand signs meant to signify a particular Highs sect, pay tribute to deceased gang members, or taunt and disrespect rival gangs.
- g. Within their territory, the Highs congregated at specific businesses and residences from which they controlled the area drug trade and dealt drugs, including fentanyl, cocaine, oxycodone hydrochloride, ecstasy (“MDMA”), and marijuana. These included, but were not limited to, the following: Merwin Liquors (700 West Broadway Avenue), Winner Gas (626 West Broadway Avenue), Walgreens (627 West Broadway Avenue), Boost Mobile (523 West Broadway Avenue), Autozone (501 West Broadway Avenue), Cub Foods (701 West Broadway Avenue), 4th Street Saloon (328 West Broadway Avenue), Wendy’s (421 West Broadway Avenue), Taco Bell (425 West Broadway Avenue), and other businesses, all of which are located at or near the West Broadway Avenue and Lyndale Avenue North intersection in Minneapolis.

Purposes of the Enterprise

- 4. The purposes of the Enterprise included, but were not limited to, the following:

- a. Enriching the leaders, members, and associates of the Enterprise through, among other things, robbery and illegal trafficking of controlled substances and firearms.
- b. Preserving and protecting the power, territory, reputation, and profits of the Enterprise through threats, intimidation, violence, and destruction, including, but not limited to, acts involving murder, robbery, assault, and other acts of violence.
- c. Promoting and enhancing the Enterprise and its members' and associates' activities.
- d. Keeping victims in fear of the Enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence.
- e. Attacking and retaliating against rival gang members through acts of violence, including, but not limited to, murder, attempted murder, assault, and other acts of violence.

Manner and Means of the Enterprise

5. Among the manner and means by which the members and associates of the Enterprise agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

- a. Committing, conspiring to commit, attempting and threatening to commit acts of violence, including murder, robbery, and assault to protect the Enterprise's power, territory, and property.

- b. To generate income, Highs members and associates engaged in illegal activities under the protection of the Enterprise, including drug trafficking, weapons trafficking, and other illegal activities to generate income.
- c. Acquiring, distributing, carrying, and using firearms in acts of violence, retaliation, and protection against rival gangs.
- d. Employing and using gang-related terminology, symbols, phrases, and gestures to demonstrate affiliation with the gang.
- e. Perpetuating the Enterprise and to maintain their power, members and associates of the Enterprise committing and conspiring to commit acts involving murder and assault against individuals who posed a threat to the Enterprise, Highs members, or jeopardized its operations.
- f. Prohibiting Enterprise members and associates from cooperating with law enforcement under threat of death.

The Racketeering Conspiracy

6. Beginning in or about 2014, and continuing through on or about the date of this Indictment, both dates being approximate and inclusive, within the District of Minnesota, and elsewhere, the defendants, **Montez Brown, a.k.a. Tez Blood (“Brown”); Dantrell Johnson, a.k.a. Trell Moe (“D.Johnson”); Gregory Hamilton, a.k.a. Lil’ Lord (“Hamilton”); Keon Pruitt, a.k.a. KenKen (“Pruitt”); Jovan Knight, a.k.a. JoJo, a.k.a. 23 (“Knight”); Tyreese Giles, a.k.a. Reese (“Giles”); Josiah Taylor, a.k.a. Joker (“Taylor”); Douglas Mobley, a.k.a. Nut (“Mobley”); Jarrett Robinson, a.k.a. Gator (“J.Robinson”); Trevaun Robinson, a.k.a. Tricky Tre (“T.Robinson”); Isaac Hodge,**

a.k.a. Ike (“Hodge”); Christopher Finch, a.k.a. Twin (“Finch”); Tony Jelks, a.k.a. BD (“Jelks”); Cortez Blakemore, a.k.a. Tez (“Blakemore”); Randy Tate, a.k.a. Randy (“Tate”); Trevoneia Felton, a.k.a. Tre (“Felton”); Chase Robertson, a.k.a. Chase Loco (“Robertson”); Malcolm Samuels, a.k.a. Reggie (“Samuels”); William Banks, a.k.a. Bear, a.k.a. Big Will (“Banks”); and Ronald Washington, a.k.a. Black (“Washington”), together and with other persons known and unknown to the Grand Jury, being persons employed by and associated with the Highs, which was engaged in and the activities of which affected interstate and foreign commerce, knowingly and intentionally conspired to violate 18 U.S.C. § 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that Enterprise through a pattern of racketeering activity consisting of multiple threats and acts involving:

- a. Murder, in violation of Minnesota Code, Section 609.185, 609.19, 609.17, 609.05, and 609.175
- b. Robbery, in violation of Minnesota Code, Sections 609.24, 609.245, 609.17, 609.05, and 609.175.

And multiple offenses involving:

- c. Trafficking and distribution of controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846

7. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Overt Acts

8. In furtherance of the conspiracy, and to effect the object and purposes thereof, the defendants, **Montez Brown, a.k.a. Tez Blood (“Brown”); Dantrell Johnson, a.k.a. Trell Moe (“D.Johnson”); Gregory Hamilton, a.k.a. Lil’ Lord (“Hamilton”); Keon Pruitt, a.k.a. KenKen (“Pruitt”); Jovan Knight, a.k.a. JoJo, a.k.a. 23 (“Knight”); Tyreese Giles, a.k.a. Reese (“Giles”); Josiah Taylor, a.k.a. Joker (“Taylor”); Douglas Mobley, a.k.a. Nut (“Mobley”); Jarrett Robinson, a.k.a. Gator (“J.Robinson”); Trevaun Robinson, a.k.a. Tricky Tre (“T.Robinson”); Isaac Hodge, a.k.a. Ike (“Hodge”); Christopher Finch, a.k.a. Twin (“Finch”); Tony Jelks, a.k.a. BD (“Jelks”); Cortez Blakemore, a.k.a. Tez (“Blakemore”); Randy Tate, a.k.a. Randy (“Tate”); Trevoneia Felton, a.k.a. Tre (“Felton”); Chase Robertson, a.k.a. Chase Loco (“Robertson”); Malcolm Samuels, a.k.a. Reggie (“Samuels”); William Banks, a.k.a. Bear, a.k.a. Big Will (“Banks”); and Ronald Washington, a.k.a. Black (“Washington”), and others known and unknown to the Grand Jury, committed various overt acts, including, but not limited to, the following:**

- 1) On or about April 24, 2014, **J.Robinson** possessed a firearm.
- 2) On or about August 11, 2015, **Tate** and Highs members were in a residence on Penn Avenue North, where **Tate** possessed marijuana with the intent to distribute and a Highs member possessed a firearm.
- 3) On or about August 11, 2015, **Tate** stated that he is a YNT member.

- 4) On or about September 27, 2016, **Brown**, another Highs member, and an unknown male were in a vehicle together when Brown fired a firearm into a vehicle driven by Victim A, who was injured by the gunfire.
- 5) On or about January 21 and January 23, 2017, **Brown** posted to Facebook advertising the sale of oxycodone hydrochloride.
- 6) On or about January 23, 2017, **Brown** sold two oxycodone hydrochloride pills.
- 7) On or about January 25, 2017, **Brown** posted a video to SnapChat in which he possessed two firearms.
- 8) On or about January 27, 2017, **Brown** was at a residence located at 26XX Emerson Avenue North, which is located within Highs territory, with other Highs members where he negotiated the sale of additional oxycodone hydrochloride and, when confronted by police, **Brown** and another Highs member ran from police.
- 9) On or about February 1, 2017, **J.Robinson** and other Highs members fired from a vehicle at two males, striking Victim B's residence in the process, and, after doing so, **J.Robinson** drove the vehicle to Winner Gas station.
- 10) On or about March 11, 2017, **J.Robinson** possessed a firearm and shot at Victim C at a gas station in Brooklyn Center.
- 11) On or about March 11, 2017, **J.Robinson** and other Highs members were in a Facebook Live video and made hand signs and discussed "sliding" on "opps."

- 12) On or about March 11, 2017, **J.Robinson** stated he is a YNT member.
- 13) On or about August 11, 2017, **Taylor** and a Highs member were in a vehicle together and drove away from the area of West Broadway Avenue in Minneapolis, where a shooting had just taken place.
- 14) On or about June 7, 2018, **T.Robinson** and another Highs member possessed two firearms.
- 15) On or about September 17, 2018, **Giles, Robertson, Banks, Samuels, Tate, J.Robinson**, now deceased Highs member Prince Martin, and other Highs members attended the funeral of Highs member Jamarius Shief, a.k.a. Boosie, who had been killed by gunfire.
- 16) On or about December 7, 2018, **Robertson** and two Highs members were in a vehicle in or around Wendy's and possessed baggies and a digital scale, and possessed with intent to distribute and did distribute marijuana.
- 17) In or about 2019, **Felton** and a Highs member robbed an individual at gunpoint.
- 18) On or about March 4, 2019, **Banks** was in a vehicle with now deceased Highs member Prince Martin at Wendy's, and possessed with intent to distribute marijuana and oxycodone hydrochloride pills and possessed U.S. currency.
- 19) On or about April 15, 2019, following the shooting of a Highs member at Merwin Liquors, **Giles** and another Highs member were in a vehicle together and possessed a firearm.

- 20) On or about June 21, 2019, **Giles** and two Highs members were in or near a vehicle with a firearm in the trunk at Autozone.
- 21) On or about July 7, 2019, **Finch, T.Robinson**, and other Highs members attended a “cemetery birthday party” for deceased Highs member Jamarius Shief, a.k.a. Boosie, who was killed by gunfire in 2018.
- 22) Later that same day, on or about July 7, 2019, **T.Robinson** and another Highs member shot in a crowded area and injured a female in downtown Minneapolis.
- 23) On or about July 7, 2019, **Finch** made several gang-related social media posts, including one where he made a “B” hand sign in tribute to deceased Highs member Jamarius Shief, a.k.a. Boosie.
- 24) On or about July 20, 2019, **Samuels** possessed marijuana and was with another Highs member at Winner Gas station where a firearm was hidden behind a dumpster.
- 25) On July 31, 2019, **T. Robinson** was at Winner Gas station while in possession of marijuana.
- 26) On or about August 2, 2019, **Hamilton** was at Winner Gas station and possessed a digital scale and possessed with the intent to distribute marijuana and MDMA pills.
- 27) On or about August 16, 2019, **Giles** possessed with intent to distribute marijuana and MDMA pills.

- 28) On or about August 16, 2019, **Tate** possessed pieces of a Glock-style firearm, items used to package drugs for individual sale, and a digital scale and possessed with intent to distribute marijuana and MDMA pills.
- 29) On or about August 27, 2019, **Banks** possessed marijuana with the intent to distribute at or around Merwin Liquors.
- 30) On or about September 9, 2019, **Giles, Tate**, now deceased Highs member Prince Martin, and other Highs members attended the funeral of deceased Highs member Kyreon Watkins, who was killed by gunfire.
- 31) On or about November 2, 2019, **Pruitt** and **Felton** drove in a stolen vehicle in Minneapolis.
- 32) On or about December 31, 2019, **Washington** conducted multiple hand-to-hand drug sales at Merwin Liquors, and possessed marijuana, cocaine, and items to package drugs.
- 33) On or about January 9, 2020, **Tate** and another Highs member were in a vehicle in and around Merwin Liquors and Winner Gas station, and **Tate** possessed marijuana with the intent to distribute.
- 34) On or about February 24, 2020, **Felton** conducted hand-to-hand drug sales at Merwin Liquors and walked back and forth to a vehicle occupied by Highs members that contained marijuana.
- 35) On or about February 28, 2020, **Banks** possessed marijuana with the intent to distribute and a loaded firearm magazine.
- 36) On or about June 2, 2020, **D.Johnson** possessed a firearm.

- 37) On July 3, 2020, **Pruitt** drove to Wally's Foods and shot Victim D in the face.
- 38) On July 4, 2020, **Pruitt, Felton**, and a Highs member were in a vehicle together in Monroe County, Wisconsin, where **Pruitt**, who was driving, fled from police.
- 39) On or about August 14, 2020, **Samuels** was at Winner Gas station and possessed items to package drugs and possessed with intent to distribute marijuana and MDMA pills.
- 40) On or about October 12, 2020, **Felton** shot at a vehicle.
- 41) On or about October 23, 2020, **Pruitt** was with Highs members in a vehicle in which three firearms were located.
- 42) On or about October 23, 2020, **Pruitt** stated he is a Highs gang member.
- 43) On or about November 17, 2020, **J.Robinson** and **Felton** were at and around Merwin Liquors, where **Felton** conducted hand-to-hand drug sales and possessed marijuana and a digital scale. **Felton** walked back and forth to a vehicle driven by **J.Robinson**.
- 44) On or about November 20, 2020, **Knight** possessed a firearm at and around Winner Gas Station.
- 45) On or about November 30, 2020, **Robertson** possessed marijuana with the intent to distribute at Taco Bell.
- 46) On or about January 17, 2021, **Pruitt, Brown, T.Robinson**, now deceased Highs member Prince Martin, and other Highs members appeared in a music

video that showed a location where Lows member Decari Starr was killed in 2010.

- 47) On or about February 2, 2021, **Pruitt, Finch**, and a Highs member were in a vehicle together at or around a restaurant near West Broadway Avenue and Lyndale Avenue and possessed a firearm, marijuana, and fentanyl pills.
- 48) On or about February 8, 2021, **Pruitt**, two Highs members, and others were in a vehicle at Merwin Liquors and possessed a firearm and marijuana.
- 49) On or about April 12, 2021, **Knight**, now deceased Highs member Jaylen Salter, juvenile Highs member Victim E, and juvenile Highs member M.W. encircled a group of Somali males and robbed them at gunpoint.
- 50) During the April 12, 2021 robbery, Highs members fired several times at the victims, shooting Victim F in the leg and killing Highs member Victim E.
- 51) After the robbery during which Highs member Victim E was shot, **Knight** and the other Highs members loaded Victim E into a vehicle driven by juvenile Highs member M.W., with **Knight** and Salter following in a separate vehicle.
- 52) While driving from the April 12, 2021 robbery scene, the vehicle driven by the juvenile Highs member M.W. struck a vehicle driven by Victim G. Victim G got out of his vehicle and Salter shot and killed him.
- 53) On or about June 7, 2021, **Finch**, Highs associate S.T., and another Highs member attempted to rob Victim H at or around Merwin Liquors.

- 54) During the June 7, 2021 attempted robbery, S.T. fired at Victim H, who also had a firearm, and Victim H shot and killed S.T.
- 55) After S.T. was shot, during the June 7, 2021 attempted robbery, **Finch** took possession of the firearm that S.T. dropped when she was shot and **Finch** repeatedly fired at Victim H as he ran away.
- 56) On or about July 21, 2021, **Boyd** possessed a firearm and possessed with the intent to distribute cocaine at and around Merwin Liquors.
- 57) On or about July 21, 2021, **Finch** possessed a firearm and **Tate** possessed a baggie containing fentanyl pills with the intent to distribute at or around Merwin Liquors.
- 58) On or about August 8, 2021, **Brown, Finch, Robertson, Taylor, Tate, Pruitt, W.Johnson, D.Johnson, Hamilton,** and other Highs members attended a memorial at Winner Gas station for Prince Martin, who was believed to be killed by a rival gang member.
- 59) On or about August 8, 2021, **D.Johnson** and **Hamilton** drove to Wally's Foods and shot Victim I.
- 60) On or about August 8, 2021, **D.Johnson, Hamilton, Pruitt,** and **W.Johnson** traveled to the Skyline Market and shot and killed Victim J, whom they believed was a rival Lows gang member.
- 61) On or about August 10, 2021, **T.Robinson,** possessed a firearm and possessed with intent to distribute fentanyl while at 4th Street Saloon.

- 62) On or about September 9, 2021, **Giles** posted a tribute to Salter on Facebook, after Salter was shot and killed earlier that day at a barbershop in Minneapolis.
- 63) On or about September 9, 2021, **Giles** traveled to the Pennwood Market and shot and killed Victim K, who was a Lows member.
- 64) On or about September 14, 2021, **Taylor** shot and killed Victim L, who was a Lows member.
- 65) On or about September 20, 2021, **Blakemore** possessed marijuana with the intent to distribute.
- 66) On or about November 7, 2021, **Knight, Hodge, Mobley**, and other Highs members shot at Victim M, striking Victim N and Victim O in the process.
- 67) On or about November 16, 2021, **Morris** and **Knight** conducted hand-to-hand drug sales of fentanyl at Winner Gas station.
- 68) On or about January 3, 2022, **Felton** was at Winner Gas station and possessed marijuana.
- 69) On or about January 7, 2022, **Knight** posted a SnapChat video where he possessed a firearm and stated, “when I see an Opp I’m going to strike.”
- 70) On or about January 7, 2022, **Morris** possessed a firearm.
- 71) On or about January 7, 2022, after destroying a memorial to deceased Lows member Emanuel Jones, **Knight** fired a firearm towards a vehicle containing Victim P, Victim Q, and Victim R.

- 72) On or about January 13, 2022, **Mobley** possessed two digital scales and U.S. currency and possessed with the intent to distribute fentanyl and cocaine.
- 73) On or about April 12, 2022, **Blakemore**, while at Merwin Liquors, sold fentanyl pills.
- 74) On or about April 26, 2022, **Blakemore**, while at Merwin Liquors, sold fentanyl pills.
- 75) On or about April 26, 2022, **Felton**, while at Winner Gas station conducted hand-to-hand drug sales.
- 76) On or about May 4, 2022, **Blakemore**, while at Walgreens, sold fentanyl pills.
- 77) On or about May 17, 2022, **Jelks**, while at Merwin Liquors, sold fentanyl pills.
- 78) On or about May 31, 2022, **Brown** possessed a firearm, drug paraphernalia, and U.S. currency, and possessed with the intent to distribute marijuana and oxycodone hydrochloride.
- 79) On or about June 6, 2022, **Jelks**, while near Merwin Liquors, possessed U.S. currency and possessed with the intent to distribute fentanyl pills.
- 80) On or about June 10, 2022, **Taylor** and a Highs member possessed a firearm and possessed with intent to distribute fentanyl pills.
- 81) On or about June 11, 2022, **Blakemore** possessed fentanyl pills with the intent to distribute.
- 82) On or about June 14, 2022, **Blakemore** sold fentanyl pills.

- 83) On or about June 23, 2022, **Blakemore** possessed cellphones and U.S. currency and possessed with intent to distribute fentanyl pills.
- 84) On or about July 7, 2022, **Washington** conducted hand-to-hand drug sales in downtown Minneapolis and possessed fentanyl pills, crack cocaine, MDMA, marijuana, and U.S. currency.
- 85) On or about July 25, 2022, **Felton**, while at Winner Gas station conducted hand-to-hand drug sales and possessed a fentanyl pill, marijuana, and U.S. currency.
- 86) On or about July 27, 2022, **Jelks**, while at Winner Gas station, fired at a vehicle traveling westbound on West Broadway Avenue.
- 87) On or about August 9, 2022, **Jelks** sold fentanyl pills and **Jelks** and **Washington** sold a firearm at Merwin Liquors.
- 88) On or about September 3, 2022, **Jelks**, arranged for the future sale of fentanyl pills while at Cub Foods.
- 89) On or about September 6, 2022, **Jelks** arranged the sale of fentanyl pills.
- 90) On or about January 17, 2023, **Felton**, **Bailey**, **Samuels**, and **Banks** conducted hand-to-hand drug sales at and around Boost Mobile.
- 91) On or about January 17, 2023, **Felton**, **Bailey**, and **Samuels** locked themselves in Boost Mobile and possessed a firearm and a digital scale. **Bailey** possessed with intent to distribute fentanyl pills.
- 92) On or about January 17, 2023, **Banks**, while at and near Boost Mobile, possessed fentanyl pills and U.S. currency.

- 93) On or about January 18, 2023, **Bell** made several fentanyl hand-to-hand sales at and around Boost Mobile. A juvenile Highs member possessed fentanyl pills and a firearm.
- 94) From on or about mid-January 2023 to on or about February 13, 2023, **Robertson** conducted numerous hand-to-hand drug sales in St. Paul.
- 95) On or about February 2, 2023, **Jelks** and **Hodge** sold fentanyl pills and **Jelks** sold a firearm.
- 96) On or about February 13, 2023, **Robertson** possessed firearms and possessed with intent to distribute fentanyl pills.
- 97) On or about April 4, 2023, **Brown** possessed a firearm, machine gun, and U.S. currency, and possessed with intent to distribute fentanyl pills.
- 98) On or about April 14, 2023, **Taylor** was at the Minneapolis-Saint Paul International Airport and possessed fentanyl pills with the intent to distribute.

NOTICE OF SPECIAL SENTENCING FACTORS

1. Beginning in or about 2021, in the District of Minnesota, and continuing to in or about the date of this Indictment, as part of the above-described racketeering conspiracy, defendants **Montez Brown, a.k.a. Tez Blood; Trevaun Robinson, a.k.a. Tricky Tre; Isaac Hodge, a.k.a. Ike; Tony Jelks, a.k.a. BD; Cortez Blakemore, a.k.a. Tez; Randy Tate, a.k.a. Randy; Chase Robertson, a.k.a. Chase Loco; Josiah Taylor, a.k.a. Joker; and William Banks, a.k.a. Bear, a.k.a. Big Will** did combine, conspire, confederate, and agree, together and with others to knowingly and intentionally distribute or possess with intent to distribute at least 400 grams of a mixture or substance containing a detectable amount of N-[1-(2-phenylethyl)-4-piperidiny] propenamide, commonly known as fentanyl, or at least 100 grams of a mixture or substance containing a detectable amount of any analogue of N-[1-(2-phenylethyl)-4-piperidiny] propenamide, (Schedule II controlled substances), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vi), and 846.

2. On or about April 12, 2021, in the District of Minnesota, as part of the above-described racketeering conspiracy, the defendant, **Jovan Knight, a.k.a. JoJo, a.k.a. 23**, aided and abetted by others, did murder Victim E, that is, did cause the death of Victim E with premeditation and with intent to affect the death of a human being while committing and attempting to commit aggravated robbery, in violation of Minnesota Code, Sections 609.185(a)(1), 609.185(a)(3), and 609.05.

3. On or about August 8, 2021, in the District of Minnesota, as part of the above-described racketeering conspiracy, the defendants, **Dantrell Johnson, a.k.a. Trell Moe;**

Gregory Hamilton, a.k.a. Lil' Lord; Keon Pruitt, a.k.a. KenKen, and William Johnson, a.k.a. Lil' Will, aided and abetted by each other, did murder Victim J, that is, did cause the death of Victim J, with premeditation and with intent to affect the death of Victim J or another person, in violation of Minnesota Code, Sections 609.185(a)(1) and 609.05.

4. On or about September 9, 2021, in the District of Minnesota, as part of the above-described racketeering conspiracy, the defendant, **Tyreese Giles, a.k.a. Reese**, did murder Victim K, that is, did cause the death of Victim K, with premeditation and with intent to affect the death of Victim K or another person, in violation of Minnesota Code Sections, 609.185(a)(1) and 609.05.

5. On or about September 14, 2021, in the District of Minnesota, as part of the above-described racketeering conspiracy, the defendant, **Josiah Taylor, a.k.a. Joker**, did murder Victim L, that is, did cause the death of Victim L, with premeditation and with intent to affect the death of Victim L or another person, in violation of Minnesota Code, Sections 609.185(a)(1) and 609.05.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO

**Using and Carrying a Firearm During and in Relation to a Crime of Violence
Causing Death**

1. At all times relevant to this Indictment, the Highs, as described in paragraphs one through five of Count One, which are realleged and incorporated by reference as if fully set forth herein, including its leadership, membership, and associates, constituted an “enterprise,” as defined by 18 U.S.C. § 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Indictment, the Highs enterprise, through its members, leaders, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, multiple acts involving murder, in violation of Minnesota Code, Section 609.185, 609.19, 609.17, 609.05, and 609.17; robbery, in violation of Minnesota Code, Sections 609.24, 609.245, 609.17, 609.05, and 609.175; and offenses involving trafficking and distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

3. On or about August 8, 2021, in the District of Minnesota, the defendants,

DANTRELL JOHNSON,
a.k.a. Trell Moe,
GREGORY HAMILTON,
a.k.a. Lil' Lord,
KEON PRUITT,
a.k.a. KenKen,
and,
WILLIAM JOHNSON,
a.k.a. Lil' Will,

each aided and abetted by the other and by others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Highs, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim J, in violation of Minnesota Code, Sections 609.185(a)(1) and 609.05, in violation of Title 18, United States Code, Sections 1959(a)(1) (Murder in Aid of Racketeering) and 2.

4. On or about August 8, 2021, in the District of Minnesota, the defendants,

DANTRELL JOHNSON,
a.k.a. Trell Moe,
GREGORY HAMILTON,
a.k.a. Lil' Lord,
KEON PRUITT,
a.k.a. KenKen,
and,
WILLIAM JOHNSON,
a.k.a. Lil' Will,

each aided and abetted by the other and by others known and unknown to the Grand Jury, did violate Title 18, United States Code, Section 924(c)(1)(A), that is, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Murder in Aid of

Racketeering (Title 18, United States Code, Section 1959(a)(1)) of Victim J, and did brandish and discharge said firearm; and in the course of such violation, did cause the death of Victim J through the use of a firearm, which killing was first-degree murder, as defined in Title 18, United States Code, Section 1111.

In violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT THREE

**Conspiracy to Distribute Controlled Substances
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A) and 846)**

From in or about August 1, 2015, and continuing through on or about April 26, 2023, in the State and District of Minnesota and elsewhere, the defendants,

**MONTEZ BROWN,
a.k.a. Tez Blood,
JOVAN KNIGHT,
a.k.a. JoJo,
a.k.a. 23,
JOSIAH TAYLOR,
a.k.a. Joker,
DOUGLAS MOBLEY,
a.k.a. Nut,
TREVAUN ROBINSON,
a.k.a. Tricky Tre,
ISAAC HODGE,
a.k.a. Ike,
CHRISTOPHER FINCH,
a.k.a. Twin,
TONY JELKS,
a.k.a. DB,
CORTEZ BLAKEMORE,
a.k.a. Tez,
RANDY TATE,
a.k.a. Randy,
TREVONEIA FELTON,
a.k.a. Tre,
CHASE ROBERTSON,
a.k.a. Chase,
MALCOLM SAMUELS,
a.k.a. Reggie,
WILLIAM BANKS,
a.k.a. Bear,
a.k.a. Big Will,
RONALD WASHINGTON,
a.k.a. Black,
DASHAUN MORRIS,
a.k.a. Mush,
ERNEST BOYD,**

**a.k.a. Shaky Shawn,
MARON BAILEY,
a/k/a Boonie,
and
ISAIAH BELL,**

did knowingly and intentionally conspire with others known and unknown to the Grand Jury to distribute at least 400 grams of a mixture or substance containing a detectable amount of N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly known as fentanyl, or at least 100 grams of a mixture or substance containing a detectable amount of any analogue of N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (Schedule II controlled substances); cocaine (a Schedule II controlled substance); 3,4-methylenedioxymethamphetamine (“MDMA”) (a Schedule I controlled substance); oxycodone hydrochloride (a Schedule II controlled substance); and marijuana (a Schedule I controlled substance); all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C) and 846.

COUNT FOUR

Possession of a Firearm in Furtherance of Drug Trafficking

On or about July 21, 2021, in the State and District of Minnesota, the defendant,

**CHRISTOPHER FINCH,
a/k/a Twin,**

did knowingly and intentionally, and in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Indictment, did possess a firearm, namely, a Glock 43X nine-millimeter semiautomatic handgun, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FIVE

Possession of a Firearm in Furtherance of Drug Trafficking

On or about July 21, 2021, in the State and District of Minnesota, the defendant,

**ERNEST BOYD,
a/k/a Shaky Shawn,**

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Indictment, did knowingly and intentionally possess a firearm, namely, a Taurus nine-millimeter semiautomatic handgun; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SIX

Possession of a Firearm in Furtherance of Drug Trafficking

On or about August 10, 2021, in the State and District of Minnesota, the defendant,

TREVAUN ROBINSON,
a/k/a Tricky Tre,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Indictment, did knowingly and intentionally possess a firearm, namely, a FN model 503 nine-millimeter semiautomatic handgun; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SEVEN

Possession of a Firearm in Furtherance of Drug Trafficking

On or about May 31, 2022, in the State and District of Minnesota, the defendant,

**MONTEZ BROWN,
a/k/a Tez Blood,**

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Indictment, did knowingly and intentionally possess a firearm, namely, a Glock semiautomatic handgun; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)

COUNT EIGHT

Possession of a Firearm in Furtherance of Drug Trafficking

On or about June 10, 2022, in the State and District of Minnesota, the defendant,

JOSIAH TAYLOR,
a/k/a Joker,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Indictment, did knowingly and intentionally possess a firearm, namely, a Glock model 20, 10-milimeter semi-automatic handgun; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT NINE

Possession of a Firearm in Furtherance of Drug Trafficking

On or about February 13, 2023, in the State and District of Minnesota, the defendant,

**CHASE ROBERTSON,
a/k/a Chase Loco,**

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to distribute controlled substances as charged in Count Three of this Indictment, did knowingly and intentionally possess a firearm, namely, a Polymer 80 model PF940C non-serialized personally made firearm, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TEN

Possession With Intent to Distribute a Controlled Substance

On or about April 4, 2023, in the State and District of Minnesota, the defendant,

**MONTEZ BROWN,
a/k/a Tez Blood,**

did unlawfully, knowingly and intentionally possess with the intent to distribute at least 400 grams of a mixture or substance containing a detectable amount of N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly known as fentanyl, or at least 100 grams of a mixture or substance containing a detectable amount of any analogue of N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, (Schedule II controlled substances), all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi).

COUNT ELEVEN

Possession of a Machinegun in Furtherance of Drug Trafficking

On or about April 4, 2023, in the State and District of Minnesota, the defendant,

**MONTEZ BROWN,
a/k/a Tez Blood,**

did knowingly and intentionally possess a machinegun, that is, a Glock, Model 17, .9mm firearm equipped with a “switch,” in furtherance of a drug trafficking crime and did knowingly and intentionally possess said machinegun during and in relation to said drug trafficking crime, that is, the offense set forth in Count Ten of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii).

COUNT TWELVE

Possession of a Firearm in Furtherance of Drug Trafficking

On or about April 4, 2023, in the State and District of Minnesota, the defendant,

MONTEZ BROWN,
a/k/a Tez Blood,

did knowingly and intentionally possess a firearm, namely, a .380 caliber firearm in furtherance of a drug trafficking crime and did knowingly and intentionally possess said firearm during and in relation to said drug trafficking crime, that is, the offense set forth in Count Ten of this Indictment, did, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE ALLEGATIONS

Counts 1-12 of this Indictment are realleged and incorporated reference for the purpose of alleging forfeitures pursuant Title 18, United States Code, Sections 924(d) and 1963, and Title 21, United States Code, Section 853.

Upon conviction of Count 1, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, the following property:

- a. any interest acquired or maintained in violation of section 1962;
- b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendant[s] established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; and
- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 1962.

Upon conviction of any of Counts 2, 4-9, 11 and 12 of this Indictment the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms, ammunition, and accessories involved in or used in the commission of Counts 2, 4-9, 11 and 12.

Upon conviction of Count 3 of 10 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds they obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations.

If any of the above-described forfeitable property is unavailable for forfeiture, the

United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 1963(m) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

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